

October 20, 1992



Mr. Ken Theison
U. S. Environmental Protection Agency
77 West Jackson Boulevard HSE-5J
Chicago, IL 60604

RE: SELMER SITE--RESPONSE TO U.S. EPA COMMENTS DATED SEPTEMBER 15, 1992

Dear Ken:

Attached are revised pages for the August 1992 work plan prepared by WW Engineering & Science to investigate the Selmer plant. These revisions were prepared to address your September 15, 1992 comments to the work plan and are in accordance with our discussions during the site visit on October 6, 1992. The following provides an explanation of the revisions.

- The scope of Phase II has been expanded to incorporate sampling of ground water by installation of temporary monitoring wells.
- page 1: The word "facility" has been changed to "site" throughout the work plan, to be consistent with the consent decree.
- page 3, last paragraph, second sentence: The date of beginning operation of distillation units has been revised.
- page 3, last paragraph, last sentence: This sentence has been deleted.
- <u>page 6</u>: The Purpose and Scope of Work has been revised to incorporate sampling of ground water through installation of temporary monitoring wells. The work plan also allows for additional investigation to delineate the extent of ground water contamination, if present, in a third phase of investigation.
- <u>page 6. last paragraph:</u> Five soil borings will be performed in the locations indicated in Figure 5, if the soil gas survey indicates no elevated concentrations. These

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locations were selected in the field by Mr. Ken Theison (U.S. EPA) and Mr. Scott Dennis (WWES) on October 6, 1992.

- Appendix A, 5.4: The results of the soil gas survey will be supplied to the U.S. EPA. This was already stated in Section 3.5 (page 13) of the work plan. The reporting discussed in Appendix A are with reference to Petrex's report to WWES.
- Appendix B, page 2: The name of WWES' Health & Safety Officer has been included.
- A project schedule has been added to the work plan as Figure 6.
- Four additional soil gas locations were added near the building, as discussed during our site visit. Figures 3 and 4 were revised accordingly.

Please replace all text of the original work plan with the enclosed text. Also, add revised Figures 3, 4, 5, and 6. The first four pages (including cover sheet) of Appendix B are also included for insertion into the original work plan. In addition, several new Standard Operating Procedures (S.O.P.'s) have been included for insertion into Appendix C. Also, a new cover has been prepared for insertion to reflect the date of this revision.

If you have any questions, please contact me at (616) 942-9600.

Sincerely,

WW ENGINEERING & SCIENCE Environmental Services Division

with T. Dennis

Scott T. Dennis, C.P.G.

Director, Environmental Investigations

Enclosures